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March 27, 2023

Hon. Jennifer L. Rochon United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: Kocar v. The Port Authority of NY and NJ, 19-cv-11508 (JLR)

Letter Motion for Second Extension in Filing Deadlines

Dear Judge Rochon:

We write jointly to request an extension in the motion and pretrial preparation schedule in this action. This is the parties' second request for an extension in these deadlines.

The Court ordered that by March 31, 2023, the parties were to submit any motions in limine. Oppositions to motions in limine were to be submitted by April 17, 2023. Further, by March 31, 2023, the parties were to submit all required pretrial filings, including their proposed joint pretrial order, requests to charge, verdict form, voir dire questions, documentary exhibits and demonstratives, and all other required submissions in accordance with Rule 5 of the Court's Individual Rules of Practice. *See* Dkt. 56.

The parties respectfully request an extension in the foregoing deadlines as follows: The motions in limine if any shall be filed on or before May 15, 2023 along with all pretrial filings as required by the Court's Individual Practice Rules. Oppositions to motions in limine shall be filed on or before June 5, 2023. This extension of time will provide the parties with sufficient time to exchange submissions and confer on the necessary witnesses and exhibits in advance of the October 30, 2023 trial date.

The reasons for this extension and its length are several. First, the parties have yet to complete their respective filings and plan to exchange documents prior to the court deadline to attempt to minimize redundancies and facilitate agreements and require additional time to effectuate this plan. Second, counsel for Plaintiff's client is working nights, which makes scheduling mutually convenient time to review exhibits difficult. Third, counsel for Defendant is

also preparing for trial scheduled to begin May 1, 2023, and therefore requires additional time to prepare both this and the upcoming trial case. Finally, counsel for Plaintiff is still short staffed, which makes trial preparation efforts slower than usual. The parties have also allowed for time to celebrate the religious holidays in April.

We would appreciate your consideration in this request.

Respectfully yours,

ADVOCATES FOR JUSTICE Chartered Attorneys Attorneys for Plaintiff THE PORT AUTHORITY LAW DEPARTMENT Attorneys for Defendant Port Authority of New York and New Jersey

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Request **GRANTED**. The deadline to submit all required pretrial submissions and motions *in limine* is extended to **May 15, 2023**. Opposition to any motions *in limine* are due by **June 5, 2023**. Although the trial date is currently scheduled for October 2023, the Court is likely to move that date up as its calendar becomes available. Accordingly, the parties should not expect further extension of these already-extended deadlines.

Dated: March 27, 2023

Janifer Rochon

New York, New York

SO ORDERED.

YENNIEER L. ROCHON United States District Judge